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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 23, 1991

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RCRA PERMITS SECTION

Catherine Buller  
Chemical Processors Inc.  
2203 Airport Way South  
Suite 400  
Seattle, WA 98134

Re: Analyses of background samples for the revised Pier 91  
closure plan

Dear Ms. Buller:

In past NODs for Chempro facilities, and in recent comments on the Draft Demonstration for Facility Closure Analyses for the Pier 91 Facility, Ecology has taken the position that background samples should be analyzed for as broad a suite of dangerous waste constituents as possible. Specifically, we have made reference to 40 CFR Part 261 Appendix VIII and its State analog WAC 173-303-9905. Recently, Cathy Kreps told Doug Brown of my staff that she has discovered that there are not approved methods of analysis for many of the constituents in Appendix VIII. She stated that she could not find commercial laboratories that would perform analyses for these constituents. In subsequent conversations, Ecology laboratory personnel have confirmed the reality of this situation.

Ecology recognizes the current difficulty in requiring analysis for all Appendix VIII constituents in background samples. Consequently, Ecology has decided, for the sake of practicability, to require background samples be analyzed for all constituents in 40 CFR Part 264 Appendix IX. We recognize that this list of constituents is, for regulatory purposes, only applicable to groundwater. However, it is a relatively complete list of constituents which can be analyzed for in a soil matrix, via standard methodologies. Additionally, Ecology may require additional background analyses based upon wastes handled at the facility.

Ecology continues to hold the position that clean closure must require, at a minimum, removal of all constituents found in Appendix VIII. Consequently, Ecology may still require more extensive analyses at the time of closure. Should hazardous constituents, which were not analyzed for in background samples, be detected at the time of closure, closure standards would be the same as for those constituents not detected in background (i.e., the PQL).

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Please incorporate the new constituent list for background analyses into the revised closure plan which you are currently developing in response to Doug Brown's letter of October 1, 1991. Ecology will revise the Draft Permit to clarify closure standards for constituents untested for in background samples, and the conditions under which additional background analyses may be required. Should you have any further questions in this regard please call Doug Brown at (206) 459-6993.

Sincerely,



Cindy J. Gilder, Supervisor  
Hazardous Waste Permits

cc: David Aggerholm, Port of Seattle  
Marsh Beery, Ecology  
Cathy Kreps, Chempro  
Carrie Sikorski, EPA Region 10  
Barb Smith, NWRO